

EDWARD J. TREDINNICK (#84033)
GREENE RADOVSKY MALONEY
SHARE & HENNIGH LLP
Four Embarcadero Center, Suite 4000
San Francisco, California 94111-4106
Telephone: (415) 981-1400
Facsimile: (415) 777-4961
E-mail: etredinnick@greeneradovsky.com

Attorneys for Creditor,
City and County of San Francisco

Additional parties and their counsel
are identified on the following pages.

UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION,

-and-

PACIFIC GAS & ELECTRIC COMPANY,

Debtors,

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

*All papers shall be filed in the Lead Case,
No. 19-30088 (DM)*

Case No.: 19-30088-DM

Chapter 11

**JOINDER OF THE CITY AND
COUNTY OF SAN FRANCISCO,
MONTEREY BAY COMMUNITY
POWER AUTHORITY AND CITY OF
SAN JOSE TO LIMITED OBJECTION
OF THE SONOMA CLEAN POWER
AUTHORITY TO MOTION FOR
PROTECTIVE ORDER OF DEBTORS**

DATE: June 26, 2019

TIME: 9:30 am

PLACE: Courtroom 17
450 Golden Gate Avenue, 16th Fl.
San Francisco, California

JUDGE: Hon. Dennis Montali

RELATED DOCKET NOS: 2459, 2647

1 CHARLES J. MCKEE (SBN 152458)
2 County Counsel
3 ROBERT M. SHAW (SBN 243300)
4 Deputy County Counsel
5 **OFFICE OF THE COUNTY COUNSEL**
6 **COUNTY OF MONTEREY**
7 168 W. Alisal Street, Third Floor
8 Salinas, CA 93901-2653
9 Telephone: 831.755.5045
10 Facsimile: 831.755.5283
11 Email: shawrm@co.monterey.ca.us
12 shawr@mbcommunitypower.org

13 *Attorneys for Creditor and Party-in-Interest*
14 **MONTEREY BAY COMMUNITY POWER AUTHORITY**

15 RICHARD DOYLE (SBN 88625)
16 City Attorney
17 EDMUNDO MORAN (SBN 86992)
18 Assistant City Attorney
19 LUISA F. ELKINS (SBN 286703)
20 Senior Deputy City Attorney
21 **CITY OF SAN JOSE**
22 **OFFICE OF THE CITY ATTORNEY**
23 200 East Santa Clara Street, 16th Floor
24 San José, CA 95113-1905
25 Telephone: 408.535.1900
26 Facsimile: 408.998.3131
27 Email: cao.main@sanjoseca.gov
28 ed.moran@sanjoseca.gov
luisa.elkins@ sanjoseca.gov

Attorneys for Creditor and Party-in-Interest
CITY OF SAN JOSE

1 The City and County of San Francisco (“**San Francisco**”) a creditor and interested party in the
2 above-captioned chapter 11 cases of Pacific Gas and Electric Company (the “**Utility**”) and PG&E
3 Corporation (“**PG&E**” and, together with the Utility, the “**Debtors**”), hereby joins, as further
4 described herein, in Sonoma Clean Power Authority’s Limited Objection to the Motion of Debtors for
5 a Protective Order [Docket # 2647]. (the “**SCPA Objection**”). This joinder is joined by Monterey
6 Bay Community Power Authority and the City of San José.

7 San Francisco generally concurs with the SCPA Objection filed herein and believes that the
8 serious concerns raised in the SCPA Objection are valid. In addition, San Francisco supports SCPA’s
9 proposed solutions with respect to the Debtor’s Proposed Protective Order.

10 **JOINDER**

11 San Francisco’s interest in the Protective Order is both as a creditor in its own right and on
12 behalf of CleanPowerSF, its own community choice aggregator (“**CCA**”). San Francisco joins the
13 SCPA and believes that the Proposed Protective Order submitted by the Debtors has the potential of
14 creating extreme burdens and unfairness to San Francisco, CleanPowerSF, and other similarly situated
15 governmental units.

16 San Francisco further supports the suggested changes proposed in the SCPA Objection, which
17 will help avoid the unintended consequences of the Debtors’ Proposed Protective Order that create
18 both procedural and substantive issues for parties such as the CCAs and others in future proceedings
19 in these Chapter 11 cases.

20 **CONCLUSION**

21 For the reasons stated herein, San Francisco joins the SCPA Objection and requests that the
22 Court implement the proposed changes set forth in the SCPA Objection in any protective order
23 established for these Chapter 11 cases.

24 Respectfully submitted,

25 Dated: June 19, 2019

GREENE RADOVSKY MALONEY
SHARE & HENNIGH LLP

27 By: /s/ Edward Tredinnick

28 Edward J. Tredinnick
Attorneys for Creditor,
City and County of San Francisco

1 Monterey Bay Community Power Authority, a California joint powers authority¹ and a
2 “governmental unit” (as defined in Bankruptcy Code section 101), joins the joinder to Sonoma Clean
3 Power Authority’s Limited Objection to the Motion of Debtors for a Protective Order.
4

5 DATED: June 19, 2019

6 RESPECTFULLY SUBMITTED,

7 COUNTY OF MONTEREY
8 Charles J. McKee, County Counsel

9 By: /s/ Robert M. Shaw
10 Robert M. Shaw
11 Deputy County Counsel

12 Attorneys for Creditor, MONTEREY BAY
13 COMMUNITY POWER AUTHORITY
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26 ¹ The governmental units that are members of Monterey Community Power Authority joint powers
27 agreement are the cities of Santa Cruz, Watsonville, Capitola, Scotts Valley, Salinas, Monterey,
28 Pacific Grove, Carmel, Seaside, Marina, Sand City, Soledad, Greenfield, Gonzales, Hollister, San
Juan Batista, San Luis Obispo, Morro Bay, and the unincorporated areas of Monterey, Santa Cruz and
San Benito Counties.

1 *City of San José*, a California Charter City (administrator of San José Clean Energy), and a
2 “governmental unit” (as defined in Bankruptcy Code section 101), joins the joinder to Sonoma Clean
3 Power Authority’s Limited Objection to the Motion of Debtors for a Protective Order.
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6 DATED: June 19, 2019

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12 Respectfully submitted,

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15 CITY OF SAN JOSE
16 Richard Doyle, City Attorney

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18 By: /s/ Luisa F. Elkins
19 Luisa F. Elkins

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21 Attorneys for Creditor and Party-in-Interest
22 City of San José
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